

Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

US EPA RECORDS CENTER REGION 5



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May 29, 1979

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**E.P.A. - D.L.P.C.
NORTHERN REGION**

Mr. George Wm. Wolff, Chief
Environmental Control Division
Office of the Attorney General
188 West Randolph, Suite 2315
Chicago, Illinois 60601

Re: Reynolds Metals Company
Variance Recommendation
PCB #79-81

Dear Mr. Wolff:

Enclosed please find the original Variance Recommendation of
the Agency in the above-captioned matter.

If you have any questions, do not hesitate to call.

Very truly yours,

William Seltzer

William Seltzer
Senior Technical Advisor
Enforcement Programs

Enclosure
WS:bkm

STATE OF ILLINOIS)
) SS:
COUNTY OF COOK)

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

REYNOLDS METALS COMPANY,)
)
 Petitioner,)
)
 -vs-)
)
ENVIRONMENTAL PROTECTION AGENCY,)
)
 Respondent.)

PCB 79-81

R E C O M M E N D A T I O N

NOW COMES Respondent the Environmental Protection Agency of the State of Illinois (hereinafter, "Agency") pursuant to Section 37 of the Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1001 et seq.) and Rule 405 of the Procedural Rules of the Illinois Pollution Control Board (hereinafter, "Board") and submits its Recommendation as follows:

The Agency recommends that Petitioner be denied a variance from Rules 303, 305(a) and 305(b) of Chapter 7: Solid Waste Rules and Regulations of the Board (hereinafter, "Chapter 7"). In the alternative, a grant of the Petition for Variance is recommended, subject to the conditions set out in paragraph 10, infra.

INTRODUCTION

1. Petitioner filed a Petition for Variance which was received by the Agency on April 9, 1979. On April 12, 1979, the variance petition was dismissed by the Board due to failure to fulfill the requirements of Rule 401 of the Board's Procedural Rules. A resubmitted Petition for Variance was filed

with the Board, and approved on May 10, 1979 for later Board consideration. This second petition was received by the Agency on April 26, 1979.

2. Petitioner seeks a variance from certain Chapter 7 operating standards for a landfill located on the property of its McCook, Illinois aluminum plant. Specifically, Petitioner seeks a five-year variance from Rules 303, 305(a) and 305(b) of Chapter 7. The variance is sought to dispose of excavation waste from a plant expansion project. The waste consists of dirt, stone, brick, concrete, and related material. Petitioner estimates that 25-50 truck loads of material are deposited daily.

3. The landfill area itself is an old quarry excavation covering approximately 3.5 acres and ranging in depth from 80-85 feet. Under present operating conditions, trucks back up to the tip of the excavation and dump the construction wastes from that point.

4. This landfill operation presently is designated as falling within the Environmental Protection Act's Section 21(e) permit exemption.

5. Plant wastes have been dumped at the site since 1942. In 1970, the Village of McCook limited disposal to demolition waste, wood, sludge from several treatment processes, dirt,

banding iron, and graphite fluxing tubes. From the mid-1960's to October, 1978, 25,000-30,000 gallons per week of sludge were deposited into the quarry. The pit now is approximate two-thirds full.

6. The quarry lies in a highly-jointed bedrock unit which is a major aquifer in northeastern Illinois. Local dependence upon this aquifer is not known. The quarry rock itself is a thin-bedded vesicular dolomite; the bedding thickness increases in the lower portions of the quarry wall.

SUPPORTING RATIONALE

8. The quarry pit is now 2/3 full of construction materials, plant wastes and sludge. The effect of these wastes on the underlying groundwater is unknown. However, due to the geologic characteristics of the site, there is a high potential for groundwater pollution from the quarry. If a variance is granted subject to the conditions set out in paragraph 10, infra., potential groundwater pollution could be prevented. Leaving the quarry as it now is, without employing methods of minimizing the ponding of precipitation, or preventing runoff infiltration, would not alleviate the potential groundwater problems at the site.

9. The potential for groundwater pollution may have been limited in the past due to high rates of pumpage by a neighboring quarry.

RECOMMENDATION

10. The Agency recommends that Petitioner be denied a variance from Rules 303, 305(a) and 305(b) of Chapter 7. In the alternative, the Agency recommends that a variance be granted until April 23, 1984, subject to the following conditions:

- (a) No combustible or putrescible material shall be placed in the quarry;
- (b) Petitioner shall develop an effective groundwater monitoring program;
- (c) Petitioner shall provide to the Agency a final grading plan designed to minimize infiltration of precipitation into the fill; ✓
- (d) Petitioner shall grade previously filled areas of the site to minimize ponding of precipitation and to prevent runoff from entering the pit;
- (e) Petitioner shall apply at least three feet of compacted clay material onto filled areas of the quarry as final cover;
- (f) Petitioner shall extinguish any underground fires at the site;
- (e) Petitioner shall within twenty-eight (28) days after the date of the Board's final order herein, execute and forward to the Illinois Environmental Protection Agency, Control Program Coordinator, 2200 Churchill Road, Springfield, Illinois, 62706, and to the Illinois Pollution Control Board, a Certificate of Acceptance and Agreement to be bound by all of the terms and conditions of the variance. The form of said Certification shall be as follows:

CERTIFICATION

I (We), _____, having read and fully understanding the Order of the Illinois

Pollution Control Board in PCB 79-81 hereby accept
said Order and agree to be bound by all of the terms
and conditions thereof.

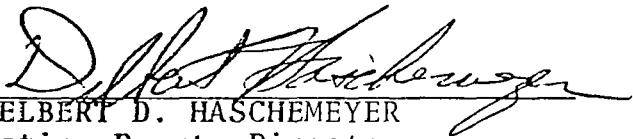
SIGNED _____

TITLE _____

DATE _____

The Agency reserves the right to alter or amend this
Recommendation at any time prior to the close of the
record herein.

ENVIRONMENTAL PROTECTION AGENCY
OF THE STATE OF ILLINOIS



DELBERT D. HASCHEMEYER
Acting Deputy Director

Date _____

LB:cd